

U.S. ENVIRONMENTAL PROTECTION AGENCY
INITIAL POLLUTION REPORT

I. HEADING

Date: January 15, 1993
From: Kevin Matheis, On-Scene-Coordinator *Jack Haney For*
USEPA, REGION II
To: C. Sidamon-Eristoff, EPA
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K. Callahan, EPA
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J. Rotola, EPA
ERD, Washington,
(E-Mail)
J. Marshall, EPA
M. Basile, EPA Niagara Falls,
E. Schaaf, EPA
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S. Becker, EPA
M. O'Toole, NYSDEC
A. Rockmore, NYSDEC
F. Shattuck, NYSDEC IX
E. Hess, NYSDEC IX
TAT

Subject: Frontier Chemical Processes, Inc., Niagara Falls,
Niagara County, NY - Cyanides, Oxidizers,
Flammables, Corrosives, Halogenated and
Non-Halogenated Solvents

POLREP NO: Two (2)

II. BACKGROUND

SITE/SPILL NO.: AY
D.O. NO.: 0026-02-036
RESPONSE AUTHORITY: CERCLA/SARA
NPL STATUS: Non-NPL
START DATE: December 21, 1992
APPROVAL STATUS: Verbal Authorization of Funding
from Deputy Regional Administrator
STATUS OF ACTION MEMO: Pending

III. RESPONSE INFORMATION

A. **Situation**

1. See Polrep #1.

B. Actions Taken

1. During the week of January 8, ERCS continued to set up the site. Trailers were set up on January 5, 1993 and offices were relocated to the trailers.
2. ERCS continued to repair/insulate the water lines and heaters in the buildings, and pumps in the boiler room. Additionally, ERCS repaired the plastic on buildings 73 and 21.
3. Results of the wastewater analysis was received Saturday, January 9, and on Monday, January 11, ERCS began discharging the site run off water into the city sewer as approved by the City of Niagara Falls Wastewater Treatment Plant. The discharge will take place over 5 days since the high level of cadmium in the water. On Saturday, an ex-Frontier employee was on site to discuss conducting a drum inventory by scanning the bar codes marked on each of the drums.
4. On January 12 and 13, ERCS Industrial Hygienist was on site to conduct a site safety audit and acquire the necessary information for preparing a site specific health and safety plan.
5. TAT conducted daily air monitoring and inspections of the drum staging areas and buildings. TAT monitored with drager tubes and a CN monitox in the cyanide treatment buildings - no readings were detected. TAT worked on the HASP back in the office. TAT worked on the community relations plan and administrative record. TAT also produced maps and diagrams of the site egress routes and location of emergency equipment.
6. On January 12, John Trela (former Frontier Chemical (General Manager) was on site to request copies of documents in the office building. He was escorted by the OSC and copies of the requested documents were made available.
7. TAT has provided air monitoring in all buildings. The building that contains approximately 100 drums of unprocessed cyanide waste has been sealed. Entry into the cyanide building will be done in Level B only, due to the health risks associated with the tanks and condition of the drums. Entry into this building will be made on a daily basis for inspection purposes.
8. The NYSDEC has provided EPA with a generator list of the drums on-site. This generator list is in software and hard copy form. It appears that some information

on the software differs from the hard copy, EPA is working with the NYSDEC to examine these discrepancies. The NYSDEC may also be able to provide EPA with a generator list pertaining to the numerous tanks on-site. The NYSDEC is attempting to access the information contained in computers on-site.

9. The OSC has directed ERCS to provide 24 hour coverage at the Site with personnel able to respond to spills or maintenance incidence. The night shifts will also pump the sump waters as needed.
10. ETI developed an operation and maintenance work plan summarizing routine responsibilities and tasks that will be required along with their frequency. They also prepared a checklist of these activities for recordkeeping purposes.

C. Future Actions

1. One chemist and one additional laborer will be mobilized next week to begin the inventory of laboratory chemicals and reagents located within the two laboratories.
2. A minimum of three bids will be solicited for the recycling/disposal of the estimated 1,500 empty drums on-site.
3. Vendor owned or leased equipment (i.e., soda machines, compressed gas cylinders, postage meters) will be returned.
4. An enforcement strategy will be developed and implemented to address the effective off-site treatment/disposal of wastes on site.

D. Key Issues

1. EPA will arrange an enforcement strategy meeting on-site to discuss PRP involvement, list of PRPs generated to date, enforcement approach, the preparation of notice letters, orders, 104 e's etc... -site.
2. EPA will meet with local emergency response officials. EPA will provide an overview/summary of what is present on-site and present contingency plan and emergency procedures.

IV. COST INFORMATION:

	Amount Budgeted	Cost To Date (As of 01/14/93)	Amount Remaining
Verbal Amount	\$ 500,000	Obligated to DCN#932AKE0004 \$ 150,000	Amount Unobligated \$ 350,000
Cleanup Contractor DCN# 932AKE0004	\$ 150,000	\$ 143,350	\$ 6,650
<u>EPA/TAT</u>	<u>\$ 250,000</u>	<u>\$ 47,000 (EST)</u>	<u>\$ 203,000</u>
SITE TOTAL	\$ 750,000	\$ 190,350	\$ 559,650
(DCN TOTAL)	\$ 150,000	\$ 143,350	\$ 6,650